IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND (Greenbelt Division)

NEHEMIAS MEJIA :

Plaintiff

:

v. Case No.:8:19-cv-01563-GJH

TELEMUNDO MID-ATLANTIC LLC

Defendant

PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS SECOND AMENDED COMPLAINT OR, IN THE ALTERNATIVE, TO STRIKE CLAIM FOR PUNITIVE DAMAGES

Plaintiff, Nehemias Mejia, by and through undersigned counsel, hereby opposes Defendant's Motion to Dismiss Second Amended Complaint or, in the Alternative, to Strike Claim for Punitive Damages. In his Amended Complaint, Plaintiff has set forth well pleaded factual allegations to support a cause of action for defamation. For this reason, and reasons set forth more fully in Plaintiff's accompanying memorandum in opposition thereto, Defendant's motion must be denied pursuant to Rule 12(b)(6).

_/s/____

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on September 17, 2019, I filed a true and correct copy of the foregoing Opposition to Defendant's Motion to dismiss Second Amended Complaint or, in the Alternative, to Strike Claim for Punitive Damages with the Court's cm/ecf system, which will cause a copy to be served on all counsel of record.

| September 17, 2019 | |
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| | /s/ |
| | Katherine D. Oates |